

217/785-1705

Initial  
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Royal Fiberglass Pools, Inc.  
Attn: Dee L. Domingue, Office Manager  
1407 Anse Broussard Highway  
Breaux Bridge, Louisiana 70517

I.D. No.: 081020AAB  
Application No.: 04110071

Date Received: November 29, 2004  
Date Issued: December 7, 2011  
Expiration Date<sup>1</sup>: December 7, 2016

Operation of: Royal Fiberglass Pools Inc., Reinforced Plastic Composite Mfg.  
Source Location: 312 Duncan Road, Dix, Jefferson County, 62830  
Responsible Official: Clifford Hebert, President

This permit is hereby granted to the above-designated Permittee to OPERATE a reinforced plastic composite manufacturing - fiberglass pools, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Michael Davidson at 217/785-1705.

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

ECB:MED:jws

cc: Illinois EPA, FOS, Region 3  
CES  
Lotus Notes

<sup>1</sup> Except as provided in Condition 8.7 of this permit.

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## 1.0 INTRODUCTION

### 1.1 Source Identification

Royal Fiberglass Pools, Inc.  
312 Duncan Road  
Dix, Illinois 62830  
410/268-7367

I.D. No.: 081020AAB  
County: Jefferson  
Standard Industrial Classification: 3089, Plastic Products (NEC)

### 1.2 Owner/Parent Company

Clifford Hebert  
3499A Main Highway  
Breaux Bridge, Louisiana 70517

### 1.3 Operator

Royal Fiberglass Pools, Inc.  
1407 Anse Broussard Highway  
Breaux Bridge, Louisiana 70517

Dee L. Domingue, Office Manager  
337/332-4386

### 1.4 Source Description

The source fabricates one-piece fiberglass swimming pools and spas within two large "building bays or booths using both spray lay-up and hand lay-up techniques using a variety of polyester laminating resins that all contain styrene monomer and/or methyl methacrylate. Styrene, which is classified as both a both a VOM and HAP, is the major pollutant of concern since it is a one of the chief components of all of the resins used at the source. Operations at the source include: open molding, mixing, cleaning of equipment, HAP-containing materials storage, and repair operations.

In general, pool fabrication starts with the application of gelcoat into a large open mold; followed by the application of a mixture of fiberglass chop and polyester resin which is then followed by a final "skin" layer of polyester resin. Gelcoat is applied using standard atomizing spray equipment or spray layup techniques and the resins are applied with a non-atomizing fluid impingement (FIT) system. Methyl ethyl ketone peroxide, MEKP, is used as a polymerization promoter throughout the process. The application method minimizes overspray and emissions.

The source also has two temperature controlled polyester resin storage tanks with internal floating roofs and permanent submerged loading, which are used to minimize VOM/HAP emissions, provide production material storage.

VOM/HAP emissions are not controlled but particulate matter is captured by a dry filter media pads within the air exhaust system.

Note: This narrative description is for informational purposes only and is not enforceable.

**2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED**

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
AS	Adjusted Standard
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
GHG	Greenhouse Gases
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MSSCAM	Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PCB	Pollution Control Board
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas)
RMP	Risk Management Plan
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit

USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

### 3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Coating operations (excluding powder, architectural and industrial maintenance coating) with aggregate VOM usage that never exceeds 15 lbs/day from all coating lines at the source, including VOM from coating, dilutents, and cleaning materials [35 IAC 201.210(a)(13)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

#### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in

addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.
- 3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70 °F, the Permittee shall comply with the applicable requirements of 35 IAC 215.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

**4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE**

Emission Unit	Description	Date Constructed	Emission Control Equipment
1	10,000 lbs (≈ 1,200 gallons) Resin Storage Tank	January, 1994	Internal Floating Roof & Submerged Loading
2	30,000 lbs (≈ 4,000 gallons) Resin Storage Tank	January, 1994	Internal Floating Roof & Submerged Loading
3	2 Open Molding Bays	January, 1994	Dry Filter Media Pads
4	Resin Mixing	January, 1994	--
5	Repair Shop	January, 1994	Dry Filter Media Pads

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Applicability of Clean Air Act Permit Program (CAAPP)

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of HAP emissions.

### 5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants (CO, lead, NO<sub>2</sub>, ozone, PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>).

### 5.3 Source-Wide Applicable Provisions and Regulations

5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.

5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

#### 5.3.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### 5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

#### 5.3.5 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

- i. Pursuant to 40 CFR 63.5785(a), this permit is issued based on the source being subject to 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.
- ii. Pursuant to 40 CFR 63.5795, the source is considered to be a "new" affected source since the affected polyester resin product manufacturing processes were constructed after August 2, 2001.
- iii. Pursuant to 40 CFR 63.5805, the Permittee must meet the requirements of 40 CFR 63.5805(a) through (h) that apply to the source. The Permittee may elect to comply using the options to meet the standards described in 40 CFR 63.5810 through 63.5830. The Permittee may use the procedures in 40 CFR 63.5799 to determine if the source meets or exceeds the 100 tpy threshold shown in 40 CFR 63.5805.

Note: Pursuant to 40 CFR 63 Subpart WWWW, emission unit specific requirements are included in Section 7.0.

- iv. Pursuant to 40 CFR 63.5925, the Permittee must comply with the applicable General Provisions in 40 CFR 63.1 through 63.15 listed in Table 15 of 40 CFR 63 Subpart WWWW.

#### 5.3.6 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit,

then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

- b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA.

#### 5.4 Source-Wide Non-Applicability of Regulations of Concern

- 5.4.1 This source is not subject to 35 IAC 212.304 through 212.310 and 212.312, because the source is not located in the geographic areas designated in 35 IAC 212.302.
- 5.4.2 This source is not subject to 35 IAC Part 212 Subpart U: Additional Control Measures, because the source does not meet the applicability criteria shown in 35 IAC 212.700.
- 5.4.3 This source is not subject to 35 IAC Part 244 Subpart C: Episode Action Plans, because the source does not meet the any of the source criteria listed in 35 IAC 244.142.
- 5.4.4 This source is not subject to 35 IAC Part 215 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes); QQ (Miscellaneous Formulation Manufacturing Processes); and RR (Miscellaneous Organic Chemical Manufacturing Processes); because the source is not located in an applicable county [35 IAC 215.920(a); 215.940(a); and 215.960(a)].
- 5.4.6 This source is not subject to 40 CFR 63 SUBPART VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, because the source is not a boat manufacturing facility as defined in 40 CFR 63.5779 [40 CFR 63.5683].

#### 5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

#### 5.6 Source-Wide Production and Emission Limitations

##### 5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall

source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	29.76
Sulfur Dioxide (SO <sub>2</sub> )	---
Particulate Matter (PM)	---
Nitrogen Oxides (NO <sub>x</sub> )	---
HAP, not included in VOM or PM	---
Total	29.76

5.6.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

#### 5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source.

#### 5.9 Source-Wide Recordkeeping Requirements

##### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

##### 5.9.2 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

- a. Pursuant to 40 CFR 63.5915(a), the Permittee must keep the following records:
  - i. A copy of each notification and report submitted to comply with 40 CFR 63 Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
  - ii. Records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2).
- b. Pursuant to 40 CFR 63.5915(c), the Permittee must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for the affected operations listed in Section 7.
- c. Pursuant to 40 CFR 63.5915(d), the Permittee must keep a certified statement that the source is in compliance with the work practice requirements in for the affected

operations listed in Section 7 and Table 4 to 40 CFR 63 Subpart WWWW, as applicable.

#### 5.9.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

#### 5.10 Source-Wide Reporting Requirements

##### 5.10.1 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

###### a. Notifications

If any information submitted in any notification submitted pursuant to 40 CFR 63.5905(a) and Table 13 of 40 CFR 63 Subpart WWWW changes, the Permittee must submit the changes in writing to the Illinois EPA within 15 calendar days after the change. [40 CFR 63.5905(b)]

###### b. Compliance Reports

Pursuant to 40 CFR 63.5910(a) through (i) and Table 14 of 40 CFR 63 Subpart WWWW, the Permittee must submit semiannual compliance reports to the Illinois EPA Compliance Section at the address shown in Condition 8.6.4(b)(i). The compliance reports shall include but are not limited to the following:

- i. Pursuant to Table 14 of 40 CFR 63 Subpart WWWW, the semiannual compliance report must contain the following [40 CFR 63.5910(a)]:
  - A. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limits and/or operating limits) that apply to the affected polyester resin product manufacturing processes shown in Section 7 and there were no deviations from the requirements

for work practice standards shown in Section 7;  
and

- B. The information in Condition 5.10.1(b) (iv) and 40 CFR 63.5910(d) if the affected polyester resin product manufacturing processes have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period.
- ii. The Permittee must submit each compliance report by the date specified in Table 14 to 40 CFR 63 Subpart WWWW and according to the following [40 CFR 63.5910(b)]:
    - A. The compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
    - B. The compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
  - iii. The compliance report must contain the following information [40 CFR 63.5910(c)]:
    - A. Company name and address.
    - B. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
    - C. Date of the report and beginning and ending dates of the reporting period.
    - D. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to the affected polyester resin product manufacturing processes, and there are no deviations from the requirements for work practice standards in Table 4 to 40 CFR 63 Subpart WWWW, as listed in Section 7.0, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
  - iv. For each deviation from an organic HAP emissions limitation ( i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards in Section 7.0, the

compliance report must contain the information in Condition 5.10.1(b)(iv) and the information listed as follows [40 CFR 63.5910(d)]:

- A. The total operating time of each affected source during the reporting period.
  - B. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- v. Pursuant to 40 CFR 63.5910(f), the Permittee must report if the source has exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make the source subject to 40 CFR 63.5805(d). Include with this report any request for an exemption under 40 CFR 63.5805(e). If Permittee received an exemption under 40 CFR 63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, the must report this exceedance as required in 40 CFR 63.5805(f).. [40 CFR 63.5910(f)]:
- vi. Pursuant to 40 CFR 63.5910(g), the Permittee must report all deviations as defined in 40 CFR 63 Subpart WWWW in the semiannual monitoring report required by Condition 8.6.1 and Section 39.5(7)(f)(i) of the Act. If an affected source submits a compliance report pursuant to Table 14 to 40 CFR 63 Subpart WWWW along with, or as part of, the semiannual monitoring report required by Condition 8.6.1 and Section 39.5(7)(f)(i) of the Act, and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in 40 CFR 63 Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the Illinois EPA.

#### 5.10.2 General Source-Wide Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

- b. All such deviations shall be summarized and reported as part of the semiannual monitoring report required by Condition 8.6.1.
- c. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the semiannual monitoring reports required by in Condition 8.6.1.
- d. All required deviation reports described in Condition 5.10.1 above shall contain the following information:
  - i. Date and time of the deviation;
  - ii. Emission units(s)/operation involved;
  - iii. The duration of the event;
  - iv. Probable cause of the deviation; and
  - v. Any corrective actions or preventative measures taken;

#### 5.10.3 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

#### 5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source.

#### 5.12 Source-Wide Compliance Procedures

##### 5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

##### 5.12.2 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Compliance with 40 CFR 63 Subpart WWWW, shown in Condition 5.3.5 shall be addressed by the recordkeeping and reporting requirements of conditions 5.9.4 and 5.10.1, and compliance procedures in section 7 (unit specific conditions for specific emission units) of this permit.

## **6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS**

This section is reserved for emissions control programs. As of the date of issuance of this permit, there are no such programs applicable to this source.

## 7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

### 7.1 Resin Storage Tanks

#### 7.1.1 Description

Two polyester resin storage tanks which are used provide production material storage. The tanks are located within the building and they are equipped with internal floating roofs and permanent submerged loading, which help to minimize VOM/HAP emissions.

Note: This narrative description is for informational purposes only and is not enforceable.

#### 7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
1	10,000 lbs (≈ 1,200 gallons) Resin Storage Tank	January, 1994	Internal Floating Roof & Submerged Loading
2	30,000 lbs (≈ 4,000 gallons) Resin Storage Tank	January, 1994	Internal Floating Roof & Submerged Loading

#### 7.1.3 Applicable Provisions and Regulations

- a. The "affected resin storage tanks" for the purpose of these unit-specific conditions, are the resin storage tanks described in Conditions 7.1.1 and 7.1.2.
- b. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.
  - i. This permit is issued based on the affected resin storage tanks at the reinforced plastic composites production facility being subject to 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production [40 CFR 63.5790(a)].
  - ii. Pursuant to 40 CFR 63.5790(b), the affected resin storage tanks are affected sources, as per 40 CFR 63 Subpart WWWW, since they are used in HAP-containing materials storage.
  - iii. Pursuant to 40 CFR 63.5925, the Permittee must comply with the applicable General Provisions in 40 CFR 63.1 through 63.15 listed in Table 15 of 40 CFR 63 Subpart WWWW.

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected resin storage tanks not being subject to 35 IAC 215.121, because the vapor pressure of the resins stored in the affected resin storage tanks are less than 17.24 kPa (2.5 psia) at 294.3°K (70°F) and because the affected resin storage tanks capacities are less than "151 cubic meters (40,000 gal)" [35 IAC 215.121].
- b. This permit is issued based on the affected resin storage tanks not being subject to 35 IAC 215.122, because the vapor pressure of the resins stored in the affected resin storage tanks are less than 17.24 kPa (2.5 psia) at 294.3°K (70°F) [35 IAC 215.122(c)].
- c. This permit is issued based on the affected resin storage tanks not being subject to 35 IAC 215.123, because volatile petroleum liquid are not stored in the affected resin storage tanks [35 IAC 215.123(a)(6)].
- d. This permit is issued based on the affected resin storage tanks not being subject to 35 IAC 215.124, because the affected resin storage tanks are not equipped with external floating roofs [35 IAC 215.124].
- e. This permit is issued based on the affected resin storage tanks not being subject to the New Source Performance Standards (NSPS) in 40 CFR Part 60, Subpart K or Ka, because the affected resin storage tanks are not used to store petroleum liquids and the tank capacities are less than 40,000 gallons [40 CFR 60.110(a) and 60.110a(a)].
- f. This permit is issued based on the affected resin storage tanks not being subject to the New Source Performance Standards (NSPS) in 40 CFR Part 60, Subpart Kb, because the affected resin storage tank capacities are not greater than or equal to 75 m<sup>3</sup> [40 CFR 60.110b(b)].
- g. This permit is issued based on the affected resin storage tanks not being subject to 35 IAC Part 215, Subpart PP, QQ or RR, because the affected resin storage tanks are not located in an applicable county listed in the regulation [35 IAC 215.920(a), 215.940(a), and 215.960(a)].
- h. The affected resin storage tanks are not subject to 35 IAC 215.301 because the affected resin storage tanks do not "use organic material" and because the affected resin storage tanks are exempt pursuant the Illinois SIP adjusted standard granted by USEPA (40 CFR 52.720(c)(188)) [Federal Register 76 (June 27, 2011): 37272-37274].
- i. The affected resin storage tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major

Stationary Sources, because the affected tanks use passive control measures, which include "seals, lids, or roofs", that are not a "control device" as per the definition in 40 CFR 64.1 [40 CFR 64.2(a)(2)].

- j. This permit is issued based on the affected resin storage tanks and associated equipment leak components not being subject to the NESHAP in 40 CFR Part 63, Subpart EEEE—National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline), because the affected resin storage tanks are an affected source under another NESHAP (i.e., 40 CFR Part 63, Subpart WWWW) [40 CFR 63.2338(c)(1)].

#### 7.1.5 Control Requirements and Work Practices

- a. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

- i. Standards

Pursuant to 40 CFR 63.5805(b), the Permittee must meet the work practice standards in Table 4 of 40 CFR 63 Subpart WWWW that apply, regardless of the quantity of HAP emitted.

- A. Table 4 to Subpart WWWW of Part 63 –Work Practice Standards

HAP-containing materials storage operation:  
The Permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

- ii. General requirements

- A. Pursuant to 40 CFR 63.5835(a), the Permittee must be in compliance at all times with the work practice standards in Condition 7.1.5(a)(i).

- B. Pursuant to 40 CFR 63.5835(c), the Permittee must always operate and maintain the affected source according to the provisions in 40 CFR 63.6(e)(1)(i).

Pursuant to 40 CFR 63.6(e)(1)(i), at all times, the owner or operator must operate and maintain the affected resin storage tank in a manner consistent with safety and good air pollution

control practices for minimizing emissions. Determination of whether operation and maintenance procedures are being used will be based on information available to the Illinois EPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

7.1.6 Production and Emission Limitations

Production and emission limitations are not set for the affected resin storage tanks.

7.1.7 Testing Requirements

Testing requirements are not set for the affected resin storage tanks.

7.1.8 Monitoring Requirements

Pursuant to 39.5(7)(b) and (d) of the Act and Condition 7.1.5(a)(i), the Permittee shall verify that the affected resin storage tanks are closed or covered as follows:

- a. Monthly inspection of the affected resin storage tanks while the affected resin storage tanks are in operation; and
- b. A visual inspection must be performed within one hour after the completion of maintenance on the affected resin storage tanks or if an affected resin storage tanks are opened for any other reason.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each affected resin storage tanks to demonstrate compliance with Conditions 5.6.1 and 7.1.5, pursuant to Section 39.5(7)(b) of the Act:

- a. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
  - i. The Permittee must keep a certified statement that the Permittee is in compliance with the work practice requirements in Conditions 7.1.5(a)(i) and Table 4 to 40 CFR 63 Subpart WWWW, as applicable [40 CFR 63.5915(d)].

b. General records

- i. Records of the compliance inspections performed pursuant to Condition 7.1.8 which include the date of the inspections and the results.
- ii. The name and identification number of each resin stored in the affected resin storage tanks with a record of the VOM, styrene, and other HAP percent by weight content and vapor pressure of the resin;
- iii. Records of resin usage/throughput, (lb/month and lb/yr); and
- iv. All data, assumptions, and calculations used to determine VOM and HAP emissions for the affected resin storage tanks.

7.1.10 Reporting Requirements

- a. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

The Permittee shall provide the following notification and reports to the Illinois EPA, Air Compliance Unit, in accordance with 40 CFR 63 Subpart WWWW, concerning affected resin storage tank:

i. Notifications:

- A. The Permittee must submit all of the notifications in Table 13 of 40 CFR 63 Subpart WWWW that apply to the source by the dates specified in Table 13 of 40 CFR 63 Subpart WWWW. The notifications are described more fully in 40 CFR 63, subpart A, as referenced in Table 13 of 40 CFR 63 Subpart WWWW [40 CFR 63.5905(a)].
- B. If the Permittee changes any information submitted in any notification, the Permittee must submit the changes in writing to the Illinois EPA within 15 calendar days after the change [40 CFR 63.5905(b)].

ii. Reports

Pursuant to 40 CFR 63.5910(a) through (i) and Table 14 of 40 CFR 63 Subpart WWWW, the Permittee must submit semiannual compliance and deviation reports to the Illinois EPA Compliance Section as per Condition 5.10.1. The compliance reports shall include but are not limited to the following:

- A. Pursuant to 40 CFR 63.5910(a) and Table 14 of 40 CFR 63 Subpart WWWW, the semiannual compliance report shall include the following:
  - 1. A statement that there were no deviations during that reporting period if no deviations from the requirements for work practice standard in Condition 7.1.5(a) (i) and Table 4 to 40 CFR 63 Subpart WWWW that apply to the affected storage tank.
  - 2. The information in Condition 5.10.1(b) (iv) and 40 CFR 63.5910(d) if you have a deviation from any work practice standard during the reporting period.

b. Reporting of Deviations

- i. Pursuant to Section 39.5(7) (f) (ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations by the affected resin storage tank from applicable requirements as follows:
  - A. Requirements in Condition 7.1.8
- ii. All such deviations shall be summarized and reported as part of the semiannual monitoring report required by Condition 8.6.1.
- iii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the semiannual monitoring reports required by Condition 8.6.1.
- iv. The deviation reports described in Condition 7.1.10(b) above shall contain the following:
  - A. Date, time and duration of the deviation;
  - B. Description of the deviation;
  - C. Probable cause of the deviation; and
  - D. Any corrective actions or preventive measures taken.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected resin storage tanks.

7.1.12 Compliance Procedures

- a. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
  - i. Demonstrating continuous compliance with the standards [40 CFR 63.5900]; and
    - A. Pursuant to 40 CFR 63.5900(a)(4), Compliance with the work practice standards in Condition 7.1.5(i) and Table 4 to 40 CFR 63 Subpart WWWW is demonstrated by performing the work practice required for the operation.
    - B. Pursuant to 40 CFR 63.5900(b), You must report each deviation from each standard in Condition 7.1.5(i) and 40 CFR 63.5805 that applies. The deviations must be reported according to the requirements in Condition 5.10.1(b) and 40 CFR 63.5910.
  - ii. Pursuant to 39.5(7)(b) and (d) off the Act, compliance with the work practice standards in Condition 7.1.5(i) and Table 4 to 40 CFR 63 Subpart WWWW is addressed by performing the inspections required in Condition 7.1.8 and by the records and reports required in Conditions 7.1.9(b)(i) and 7.1.10(b)

7.2 Fiberglass Pool and Spa Manufacturing

7.2.1 Description

The Permittee fabricates fiberglass swimming pools and spas within two large "building bays or booths using both spray lay-up and hand lay-up techniques and a variety of polyester laminating resins that all contain styrene monomer and/o . Operations at the source include: open molding, mixing, cleaning of equipment, and repair operations. VOM/HAP emissions are not controlled but particulate matter is captured by a dry filter media pads that filter air passing through the exhaust inlets to the air exhaust system. Resin is applied with a fluid impingement (FIT) system, more commonly termed as "flowcoater" guns. Gelcoat is applied using standard atomizing spray equipment.

Note: This narrative description is for informational purposes only and is not enforceable.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
3	2 Open Molding Bays	January, 1994	Dry Filter Media Pads
4	Resin Mixing	January, 1994	--
5	Repair Shop	January, 1994	Dry Filter Media Pads

7.2.3 Applicable Provisions and Regulations

- a. The "affected polyester resin product manufacturing processes" for the purpose of these unit-specific conditions, are the various processes described in Conditions 7.2.1 and 7.2.2.
- b. PM and Opacity Rules
  - i. The affected polyester resin product manufacturing processes are subject to 35 IAC 212.321(a) for PM emissions. The Permittee shall not cause or allow the emission of PM into the atmosphere in any one hour period, either alone or in combination with the emission of particulate matter from all similar process emission units at the source or premises to exceed the allowable emissions rates specified in Attachment 2.
  - ii. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than

those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

c. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

i. Pursuant to 40 CFR 63.5785(a), this permit is issued based on the “affected polyester resin product manufacturing processes” at the reinforced plastic composites production facility being subject to 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

ii. Pursuant to 40 CFR 63.5790(b), the affected source consists of all parts of the source engaged in the following operations: open molding (gelcoating), polymer casting, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts manufactured at the source.

iii. Standards

Pursuant to 40 CFR 63.5805(b), the Permittee shall meet the applicable organic HAP emissions limits in Table 3 of 40 CFR 63 Subpart WWWW and the work practice standards in Table 4 of 40 CFR 63 Subpart WWWW, at all times regardless of the quantity of HAP emitted.

A. Table 3 to Subpart WWWW of Part 63 –Organic HAP Emissions Limits:

Open molding– corrosion- resistant and/or high strength (CR/HS)	• mechanical resin application	113 lb/ton
	• manual resin application	123 lb/ton.
open molding– non-CR/HS	• mechanical resin application	88 lb/ton.
	• manual resin application	87 lb/ton
Open molding– tooling	• mechanical resin application	254 lb/ton
	• manual resin application	157 lb/ton.
Open molding–gel coat <sup>1</sup>	• tooling gel coating	440 lb/ton
	• CR/HS or high performance gel coat	605 lb/ton

B. Table 4 to Subpart WWWW of Part 63 –Work Practice Standards

1. Cleaning operation: The Permittee must not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
2. HAP-containing materials storage operation: The Permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
3. Mixing Operations:
  - I. The Permittee must use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
  - II. The Permittee must close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
  - III. The Permittee must keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer

casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

- C. Pursuant to 40 CFR 63.5805(g), repair operations, as defined in 40 CFR 63.5785, at the source must meet the requirements in Condition 7.2.3(c) (iii) (A) and B and Tables 3 and 4 of 40 CFR 63 Subpart WWWW that are applicable.

iv. General requirements

- A. Pursuant to 40 CFR 63.5835(a), the Permittee must be in compliance at all times with the work practice standards in Condition 7.2.3(c) (iii) (B) and in Table 4 of 40 CFR 63 Subpart WWWW, as well as the organic HAP emissions limits in Condition 7.2.3(c) (iii) (A) and in Tables 3, that Permittee is meeting without the use of add-on controls.
- B. Pursuant to 40 CFR 63.5835(c), the Permittee must always operate and maintain the affected source according to the provisions in 40 CFR 63.6(e) (1) (i).
- C. Pursuant to 40 CFR 63.5925, the Permittee must comply with the applicable General Provisions in 40 CFR 63.1 through 63.15 listed in Table 15 of 40 CFR 63 Subpart WWWW.

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected polyester resin product manufacturing processes not being subject to the coating limitations in 35 IAC 215.204, because the process does not meet the definition of "coating" in 35 IAC 211.1190(a). Specifically, because the resins applied to the mold substrate are not applied to the mold for a "protective, decorative, or functional purpose(s)" but rather the resins form an integral part of a polyester resin product.
- b. This permit is issued based on the affected polyester resin product manufacturing processes not being subject to 35 IAC Part 215, Subpart PP, QQ or RR, because the affected polyester resin product manufacturing processes are not located in an applicable county listed in the regulation [35 IAC 215.920(a), 215.940(a), and 215.960(a)].
- c. This permit is issued based on the affected polyester resin product manufacturing processes not being subject to 35 IAC

215.301 because of the Illinois SIP adjusted standard granted by USEPA (40 CFR 52.720(c)(188)) [*Federal Register* 76 (June 27, 2011): 37272-37274].

- d. This permit is issued based on the affected polyester resin product manufacturing processes not being subject to 40 CFR 63, Subparts U and JJJ: National Emission Standards for Hazardous Air Pollutants: Group I and IV Polymers and Resins, because the source does not meet the applicability requirements of these subparts [40 CFR 63.480 and 63.1310].
- e. This permit is issued based on the affected polyester resin product manufacturing processes not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources because the affected polyester resin product manufacturing processes do not use an add-on control device to achieve compliance with an emission limitation or standard pursuant to 40 CFR 64.2(b)(1)(i).

#### 7.2.5 Control Requirements and Work Practices

- a. Pursuant to Condition 7.2.4(c) and the Illinois SIP adjusted standard granted by USEPA (40 CFR 52.720(c)(188)) and, as per the USEPA approval, the Illinois PCB order, 35 IAC 215.301 does not apply at the source. The Permittee shall comply with the following [*Federal Register* 76 (June 27, 2011): 37272-37274 and *Illinois PCB, AS 2009-004, February 18, 2010*]:
  - i. The Permittee shall comply at all times with the emission limitations in Condition 7.2.3(c) and 40 CFR 63 Subpart WWWW.
  - ii. Relief from compliance with 35 IAC 215.301 shall be limited to the swimming pool manufacturing emission units existing as of August 20, 2009 at the source.
  - iii. The Permittee must investigate swimming pool production methods that generate fewer VOM emissions and materials that have a reduced VOM content. Where practicable, the Permittee must substitute current materials with lower VOM content materials as long as such substitution does not result in a net increase in VOM emissions.
  - iv. Upon request by Illinois EPA, the Permittee must perform testing of new technologically or economically reasonable production methods or materials applicable to the open-mold swimming pool manufacturing industry, which may reduce VOM emissions at the source.

- v. The Permittee must prepare and submit an annual report summarizing the activities and results of any investigatory efforts in Condition 7.2.5(a) (i) and (ii) above. The report must be submitted to the Illinois EPA, Bureau of Air, Compliance and Enforcement Section.

7.2.6 Production and Emission Limitations

Production and emission limitations are not set for the affected polyester resin product manufacturing processes.

7.2.7 Testing Requirements

- a. Pursuant to 39.5(7) (c) and (d) of the Act, the Permittee shall use the following procedures to determine the VOM content of materials used in the affected polyester resin product manufacturing processes:
  - i. Testing Methods.
    - A. The VOM and HAP content of fresh cleaning materials shall be determined from supplier data or by sampling and analysis using USEPA Reference Method 24 and/or the methods and procedures in Condition 7.2.7(b).
    - B. The monomer content of polyester resin materials shall be determined:
      - 1. From supplier data and operating data;
      - 2. By sampling and analysis by the methods set forth in SCAQMD Method 312-91 and/or the methods and procedures in Condition 7.1.7(b); or
      - 3. By site-specific sampling and analysis methods approved by the Illinois EPA and USEPA in a federally enforceable permit.
    - C. In the event of a difference between data obtained by sampling and analysis and other data, the data from sampling and analysis shall govern.
  - ii. When in the opinion of the Illinois EPA it is necessary to conduct sampling and analysis to demonstrate compliance with Condition 7.2.7(a) (i), the Permittee shall, at his own expense, conduct such sampling and analysis in accordance with the applicable test methods and procedures specified in Condition 7.2.7(a) (i). The Illinois EPA's decision to invoke this requirement may be based on such

factors including, but not limited to, a change in operation of the affected polyester resin products manufacturing process, or a reasonable belief that a previous test resulted in erroneous data.

- b. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
  - i. Pursuant to 40 CFR 63.5797, the Permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), to determine the organic HAP content of resins and gel coats, using the procedures specified below, as applicable.
    - A. Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds [40 CFR 63.5797(a)].
    - B. If the organic HAP content is provided by the material supplier or manufacturer as a range, the Permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by USEPA Method 311 of Appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the Permittee must use the measured organic HAP content to determine compliance [40 CFR 63.5797(b)].
    - C. If the organic HAP content is provided as a single value, the Permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the Permittee still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the Permittee must use the measured organic HAP content to determine compliance [40 CFR 63.5797(c)].

#### 7.2.8 Monitoring Requirements

- a. Pursuant to 39.5(7)(b) and (d) off the Act, the Permittee shall perform the following:
  - i. Pursuant to Condition 7.2.3(c)(iii)(B)(2) and (3) and the work practices in Table 4 to Subpart WWWW of Part 63, the Permittee shall perform weekly inspections to verify that all HAP-containing materials storage and mixing operations are closed or covered except as provided for by the referenced provisions. This provision excludes the tanks referenced in Section 7.1;
  - ii. Pursuant to the PM and opacity limits in Condition 7.2.3(b)(i) and (ii) and the limitations in 35 IAC 212.321(a) and 35 IAC 212.123(a), respectively, the Permittee shall perform weekly inspections verify their proper operation and maintenance of the exhaust filters while the spray layup operation is being performed. As part of the inspections, the Permittee shall perform observations for visible emissions by Method 22. These observations shall be conducted for a minimum of 18 minutes. If visible emissions are observed, the Permittee shall take corrective action within 2 hours to return the status of the operations to no visible emissions or observations of opacity by Method 9 shall be conducted. For the purpose of this condition, returning the status of the affected polyester resin product manufacturing processes to no visible emissions does not include, for any activity, temporary idling or the lack of operations;
  - iii. Pursuant to Condition 7.2.3(c)(iii)(B)(1) and the work practices in Table 4 to Subpart WWWW of Part 63, the Permittee shall verify that cleaning solvents used at the source do not contain HAP by monitoring the VOM and HAP content of cleaning solvents and other materials used at the source as follows:
    - A. As required in Condition 7.2.9(a), the Permittee shall keep and maintain records of the VOM and HAP content of cleaning solvents and other materials used at the source;
    - B. VOM and HAP content of cleaning solvents and other materials used at the source shall be determined using the methods and procedures in Condition 7.2.7(a) and (b).

#### 7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each

affected emission unit to demonstrate compliance with Conditions 5.6.1, 7.2.3, 7.2.6, 7.2.7, and 7.2.12, pursuant to Section 39.5(7) (b) of the Act:

a. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

- i. A. Pursuant to 40 CFR 63.5895(c), the Permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used. Resin use records may be based on purchase records if the Permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.
- B. Pursuant to 40 CFR 63.5895(d), the Permittee must keep and maintain copies of all data, assumptions, and calculations used to calculate compliance using the method in Condition 7.2.12(d) (i) on a 12-month rolling average.
- ii. Pursuant to 40 CFR 63.5915(a) (1), the Permittee must keep and maintain a copy of each notification and report submitted to comply with 40 CFR 63 Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirements in 40 CFR 63.10(b) (2) (xiv).
- iii. Pursuant to 40 CFR 63.5915(c), the Permittee must keep and maintain copies of all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for all operations listed in Condition 7.2.3(c) (iii) (A).
- iv. Pursuant to 40 CFR 63.5915(d), the Permittee must keep and maintain a certified statement that the source is in compliance with the work practice requirements in Condition 7.2.3(c) (iii) (B).

b. Adjusted Standard

Pursuant to Conditions 7.2.4(c) and 7.2.5(a), the Permittee shall retain and maintain the following:

- i. A listing of all emission units covered by the adjusted standard (i.e., a listing of swimming pool manufacturing emission units existing as of August 20, 2009 at the source);

- ii. Records regarding any investigations or testing undertaken to reduce VOM emissions from the affected polyester resin product manufacturing processes;
  - iii. Written justification why a particular VOM emissions reducing new technologically and/or production methods or materials, which was investigated as per Condition 7.2.5(a), was not acceptable; and
  - iv. A summary of the compliance status of the emission units covered by the adjusted standard pursuant to 40 CFR 63 Subpart WWWW.
- c. General records
- i. The Permittee shall keep the records related to material usage in the affected polyester resin product manufacturing processes these include the following.
    - A. The name and identification number of all mold release agents, sealers, wipe cleaning solvents, other solvents solvent, gel coatings and resins as applied at the source;
    - B. Monthly usage records of the material used, (lb/month and lb/yr);
    - C. The VOM, styrene, MMA and other HAP percent by weight content of the material used. Along with identification of the source of this information; and
    - D. If applicable, usage of any raw resin or other HAP containing material used to clean closed systems or application equipment.
  - ii. The Permittee shall maintain the following records to demonstrate good operating practices and procedures for the exhaust filters:
    - A. Records for periodic inspection of the fabric filters and visible emissions from the exhaust points of the affected polyester resin product manufacturing processes, as required in Condition 7.2.8, with date, individual performing the inspection, and the nature of the inspection.
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired and nature of repair.

- iii. The Permittee shall keep the following records related to emissions from the affected booths.
  - i. A file containing all data, assumptions, and calculations used to determine VOM and organic HAP emissions factors for affected emission units.
  - ii. The monthly and aggregate VOM and HAP emissions from the affected booths based on the material usage, with all supporting calculations and documentation.

7.2.10 Reporting Requirements

- a. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
  - i. Notifications
    - A. The Permittee must submit all of the notifications in Table 13 of 40 CFR 63 Subpart WWWW that apply to the source by the dates specified in Table 13 of 40 CFR 63 Subpart WWWW. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 of 40 CFR 63 Subpart WWWW. [40 CFR 63.5905(a)]
    - B. If any information submitted in any notification submitted pursuant to 40 CFR 63.5905(a) and Table 13 of 40 CFR 63 Subpart WWWW changes, the Permittee must submit the changes in writing to the Illinois EPA within 15 calendar days after the change. [40 CFR 63.5905(b)]
  - ii. Compliance Reports

Pursuant to 40 CFR 63.5910(a) through (i) and Table 14 of 40 CFR 63 Subpart WWWW, the Permittee must submit semiannual compliance reports to the Illinois EPA Compliance Section at the address shown in Condition 8.6.4(b) (i). The compliance reports shall include but are not limited to the following:

    - A. Pursuant to Table 14 of 40 CFR 63 Subpart WWWW, the semiannual compliance report must contain the following [40 CFR 63.5910(a)]:
      - 1. A statement that there were no deviations during that reporting period if there were no deviations from any emission

limitations (emission limits and/or operating limits) that apply to the affected polyester resin product manufacturing processes and there were no deviations from the requirements for work practice standards in Table 4 to 40 CFR 63 Subpart WWWW that apply to the affected polyester resin product manufacturing processes; and

2. The information in Condition 7.2.10(a)(ii)(D) and 40 CFR 63.5910(d) if the affected polyester resin product manufacturing processes have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period.

B. The Permittee must submit each compliance report by the date specified in Table 14 to 40 CFR 63 Subpart WWWW and according to the following [40 CFR 63.5910(b)]:

1. The compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
2. The compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

C. The compliance report must contain the following information [40 CFR 63.5910(c)]:

1. Company name and address.
2. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
3. Date of the report and beginning and ending dates of the reporting period.
4. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to the affected polyester resin product manufacturing processes,

and there are no deviations from the requirements for work practice standards in Table 4 to 40 CFR 63 Subpart WWWW, as listed in Condition 7.2.3(c), a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

- D. For each deviation from an organic HAP emissions limitation ( i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards in Condition 7.2.3(c), the compliance report must contain the information in Condition 7.2.10(a) (ii) (C) and the information listed as follows [40 CFR 63.5910(d)]:
1. The total operating time of each affected source during the reporting period.
  2. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- E. Pursuant to 40 CFR 63.5910(g), the Permittee must report all deviations as defined in 40 CFR 63 Subpart WWWW in the semiannual monitoring report required by Condition 8.6.1 and in 40 CFR 70.6(a) (3) (iii) (A) or 71.6(a) (3) (iii) (A). If the Permittee submits a compliance report pursuant to Condition 7.2.10(a) (ii) (A) and Table 14 to 40 CFR 63 Subpart WWWW along with, or as part of, the semiannual monitoring report required by Condition 8.6.1 and/or 40 CFR 70.6(a) (3) (iii) (A) or 71.6(a) (3) (iii) (A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

b. Adjusted standard

- i. The Permittee must prepare and submit an annual report to the Illinois EPA, Bureau of Air, Compliance and Enforcement Section (See Condition 8.6.4) (b) (i)), summarizing the activities and results of any investigatory efforts required under Condition 7.2.5(a) (i) and (ii). [Federal Register 76 (June 27, 2011): 37272-37274 and *Illinois PCB, AS 2009-004, February 18, 2010*]
- ii. The annual report, required above in Condition 7.2.10(b) (i), shall include the information required in Condition 7.2.9(b). This includes the following [39.5(7) (b) of the Act]:
  - A. A listing of all emission units covered by the adjusted standard (i.e., a listing of swimming pool manufacturing emission units existing as of August 20, 2009 at the source) as of the date of the report;
  - B. Written justification why a particular VOM emissions reducing new technologically and/or production methods or materials, which was investigated as per Condition 7.2.5(a), was not acceptable;
  - C. A summary of the compliance status of the emission units covered by the adjusted standard pursuant to 40 CFR 63 Subpart WWWW; and
  - D. The Permittee must report if no investigations or testing were performed during the reporting period.

c. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of an affected emission units with the permit requirements as follows, pursuant to Section 39.5(7) (f) (ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. Deviations that must be reported include the following:

- i. Failure to perform the required inspections and/or monitoring referenced under Condition 7.2.8(a) within 30 days of such occurrence.
- ii. The Permittee shall report deviations from the requirements in Condition 7.2.5(a) within 30 days of such occurrence. Deviations reported pursuant to

Condition 7.2.10(a) shall be reported as a deviation pursuant to Condition 7.2.5(a).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected emission units.

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(b) (PM and Opacity Rules) shall be demonstrated by the monitoring requirement in Condition 7.2.8(a)(ii); and the recordkeeping and reporting requirements in Condition 7.2.9(b)(iii) and 7.2.10(c).
- b. Compliance with Condition 7.2.3(c) (40 CFR 63 Subpart WWWW) shall be demonstrated by the testing requirements in Condition 7.2.7(b); monitoring requirement in Condition 7.2.8(a)(i); and the recordkeeping and reporting requirements in Condition 7.2.9(a) and 7.2.10(a); and the compliance calculation procedures described in Condition 7.2.12(d).
- c. Compliance with Conditions 7.2.5(a) is addressed by the records and reports required in Conditions 7.2.9(b)(i) and 7.2.10(b) and (c).
- d. 40 CFR 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

For affected polyester resin product manufacturing processes, compliance with the applicable open molding standards, limitations and requirements of 40 CFR 63 Subpart WWWW is addressed as follows:

- i. Pursuant to 40 CFR 63.5810(c), the Permittee shall demonstrate compliance each month that the source meets each weighted average of the organic HAP emissions limits in Condition 7.2.3(c)(iii)(A) and in Table 3 of 40 CFR 63 Subpart WWWW. When using this option, the Permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations.
  - A. Pursuant 40 CFR 63.5810(c)(1), each month calculate the weighted average organic HAP emissions limit for all open molding operations for the source for the last 12-month period to determine the organic HAP emissions limit the Permittee must meet. To do this, multiply the individual organic HAP emissions limits shown in Condition 7.2.3(c)(iii)(A) and in Table 3 of 40 CFR 63 Subpart WWWW for each open molding

operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in Equation 3 of 40 CFR 63 Subpart WWWW.

- B. Pursuant to 40 CFR 63.5810(c)(2), each month calculate the weighted average organic HAP emissions factor for open molding. To do this, multiply the actual open molding operation organic HAP emissions factors as per the calculation procedure shown in 40 CFR 63.5810(b)(1) and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 4 of 40 CFR 63 Subpart WWWW.
- C. Pursuant to 40 CFR 63.5810(c)(3), compare the values calculated in Condition 7.2.12(a)(i)(A) and (B). If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the source is in compliance.

ii. Demonstrating continuous compliance with the standards [40 CFR 63.5900]; and

- A. Pursuant to 40 CFR 63.5900(a), the Permittee must demonstrate continuous compliance with each standard in Condition 7.2.3(c)(iii)(A) using the following methods:
  - 1. Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Condition 7.2.3(c)(iii)(A), on a 12-month rolling average, using the recordkeeping, reporting, and compliance procedures in Conditions 7.2.9(b), 7.2.10(a)(ii), and 7.2.12(a)(i), respectively.
  - 2. I. Compliance with the work practice standards in Condition 7.2.3(c)(iii)(B) and Table 4 to 40 CFR 63 Subpart WWWW is demonstrated

by performing the work practice required for your operation; and

II Pursuant to 39.5(7)(b) and (d) of the Act, compliance with the work practice standards in Condition 7.2.3(c)(iii)(B) and Table 4 to 40 CFR 63 Subpart WWWW is addressed by performing the inspections required in Condition 7.2.8 and by the records and reports required in Conditions 7.2.9(b)(i) and 7.2.10(b).

B. Pursuant to 40 CFR 63.5900(b), the Permittee must report each deviation from any standard in Condition 7.2.3(c)(iii). The deviations must be reported according to the requirements in Condition 7.2.10(a)(ii).

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after December 1, 2011 (the date of issuance of the proposed permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

## 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7) (f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

#### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7) (a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The

test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:
  - i. Illinois EPA - Air Compliance Unit  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance & Enforcement Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Quality Planning Section  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Air Quality Planning Section (MC 39)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, any Title I conditions that would be included in this permit in the future, which would be identified by a T1, T1N, or T1R designation, would remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions would either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) be newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

#### 9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

#### 9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

#### 9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under.

#### 9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

### 9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment),

practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

##### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

##### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7) (e) (ii) of the Act].
- b. Other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

## 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Air Quality Planning Section no later than May 1 of the following year, as required by 35 IAC Part 254.

## 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

##### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

**10.0 ATTACHMENTS**

Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

where:

P = Process weight rate; and  
 E = Allowable emission rate; and,

- A. Up to process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

- B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.55 pounds per hour [35 IAC 266.110].

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

$$E = C + A(P)^B$$

where:

P = Process weight rate; and  
E = Allowable emission rate; and,

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.55 pounds per hour [35 IAC 266.110].

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

#### Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, [www.epa.state.il.us](http://www.epa.state.il.us). This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

##### Guidance On Revising A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-revising.pdf](http://www.epa.state.il.us/air/caapp/caapp-revising.pdf)

##### Guidance On Renewing A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-renewing.pdf](http://www.epa.state.il.us/air/caapp/caapp-renewing.pdf)

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

[www.epa.state.il.us/air/caapp/index.html](http://www.epa.state.il.us/air/caapp/index.html)

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

[www.epa.state.il.us/air/caapp/199-caapp.pdf](http://www.epa.state.il.us/air/caapp/199-caapp.pdf)

[www.epa.state.il.us/air/permits/197-fee.pdf](http://www.epa.state.il.us/air/permits/197-fee.pdf)